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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA : HON. Claire C. Cecchi  
v. : **CRIMINAL COMPLAINT**

ROCO ZASA,  
ANTHONY JAMES ZASA, JR., : Magistrate No. 07- 4022  
KACEY HALLFORD ROOT and  
ALEX HETHERINGTON, a/k/a "ALEX LNU" :

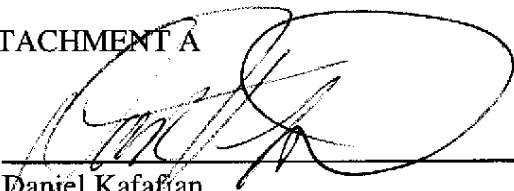
I, Daniel Kafafian, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about February 26, 2007 and February 27, 2007 in the District of New Jersey and elsewhere, defendants did:

knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute 5 kilograms or more of cocaine, a Schedule II narcotic drug controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and

In violation of Title 21, United States Code, Section 846.

I further state that I am a Special Agent with the Drug Enforcement Administration and that this complaint is based on the following facts:

SEE ATTACHMENT A

  
\_\_\_\_\_  
Daniel Kafafian  
Special Agent  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

Feb 27, 2007 at Newark, New Jersey  
Date City and State

Honorable Claire C. Cecchi  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

ATTACHMENT A

I, Daniel Kafafian, am a Special Agent with the Drug Enforcement Administration. Based upon my investigation and my discussions with other individuals involved in this investigation, I have knowledge of the following facts:

1. On or about February 22, 2007, in Groom, Texas, law enforcement officers recovered over 200 kilograms of suspected cocaine as a result of a traffic stop of a Winnebago. The driver of the vehicle and sole occupant was identified as ROCO ZASA.

2. The recovered substance tested positive for the presence of cocaine.

3. ROCO ZASA provided information to law enforcement that defendants ALEX LNU (now identified as ALEX HETHERINGTON) and ANTHONY ZASA, JR., ROCO ZASA's brother, originally possessed the drugs, loaded them in the ROCO ZASA's Winnebago and agreed to pay ROCO ZASA for transporting the drugs to New Jersey for further distribution.

4. ROCO ZASA told law enforcement that ANTHONY ZASA, JR. had told ROCO ZASA to travel to Elizabeth, New Jersey and stay at a designated hotel where a reservation had been made for him by ANTHONY ZASA, Jr. and await further instructions.

5. ROCO ZASA also agreed to participate in a controlled delivery of the drugs.

6. Subsequent to his arrival in New Jersey, ROCO ZASA continued to receive instruction from ANTHONY ZASA, Jr. as to how the drugs were to be delivered. Specifically, ANTHONY ZASA, JR. Told ROCO ZASA that ALEX HETHERINGTON, whom ROCO ZASA knew from witnessing ALEX HETHERINGTON load the drugs in the Winnebago would be picking the drugs up from the designated hotel, with another individual.

7. Sham narcotics were substituted for the original narcotics.

8. Defendants ALEX HETHERINGTON and KACEY HALLFORD ROOT arrived at the Hilton Hotel at the time ANTHONY ZASA, JR. indicated they would arrive. ALEX HETHERINGTON and KACEY HALLFORD ROOT came to ROCO ZASA's room, conversed with him regarding the exchange, loaded the sham narcotics in their rental vehicle and stayed in the hotel overnight. Defendants ALEX HETHERINGTON and KACEY HALLFORD ROOT were arrested after they left the Hilton Hotel in Carlstadt, New Jersey. Post arrest, defendant KACEY HALLFORD ROOT admitted that he and ALEX HETHERINGTON were aware that they were receiving illegal drugs for further distribution.